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Subject: Environmental Defense comments on 2-Chloro-N-(Chloromethyl)-N-(2,6-Diethylphenyl) Acetamide (CAS# 40164-69-0)

(Submitted via Internet 6/1/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and Clyde.l.livingston@monsanto.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for 2-Chloro-N-(Chloromethyl) -N-(2,6-Diethylphenyl) Acetamide (CAS# 40164-69-0).

The Monsanto Company, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted robust summaries and a test plan describing available data for 2-Chloro-N-(Chloromethyl) -N-(2,6-Diethylphenyl) Acetamide, known commercially as CMA. According to the test plan and robust summaries, CMA is produced in a single plant in the United States and is used solely as a process intermediate in the synthesis of alachlor and other structurally similar herbicides. CMA may also be shipped to other plants in the United States and other countries for use in the synthesis of these same herbicides.

The herbicide Alachlor has a very similar chemical structure to that of CMA. As a herbicide, alachlor has been thoroughly studied to meet provisions set under FIFRA by the United States and similar requirements of other countries. In order to minimize further testing, Monsanto Company proposes to bridge data from alachlor to predict the properties CMA when appropriate data for CMA are not available.

Our review of this submission indicates CMA appears to have low potential for environmental or human exposure. Further, with the exception of high toxicity to algae (based on data bridged from alachlor) it has little environmental or mammalian acute toxicity, it is not mutagenic and it should not persist in the environment. Therefore, we are in general agreement with Monsanto that where necessary it is appropriate to bridge of data from alachlor to predict properties of CMA. Thus, no additional testing of CMA should be necessary.

The following are relatively minor points that might be addressed to improve the quality of this submission.

1. Structural formulas of both CMA and alachlor should be included in the test plan.
2. It is inferred that CMA may be shipped to other plants for synthesis of the respective herbicides because CMA has better shipping qualities than the finished product, but that is not specifically stated.
3. It is stated in the robust summary describing Water Solubility that CMA reacts slowly with water. This statement is inconsistent with statements in the test plan and robust summary for Stability in Water that CMA reacts extremely rapidly with water. Which is correct?

Thank you for this opportunity to comment.

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